

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KONINKLIJKE PHILIPS N.V. AND
PHILIPS ELECTRONICS NORTH AMERICA
CORPORATION,

Plaintiffs,

v.

ZOLL MEDICAL CORPORATION AND
FISH & RICHARDSON P.C.,

Defendant.

CIVIL ACTION NO. 1:14-mc-91121

PHILIPS'S MOTION TO COMPEL

Plaintiffs, Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, "Philips"), hereby move to compel the production of documents and privilege logs pursuant to third-party subpoenas served on Zoll Medical Corporation and Fish & Richardson P.C. in the case captioned, *Koninklijke Philips N.V. v. Zoll Lifecor Corp.*, No. 2:12-cv-1369-NBF (W.D. Pa.). The reasons for the motion are fully set forth in the accompanying memorandum.

Philips respectfully requests an order from this Court compelling Zoll Medical and Fish & Richardson to comply with Philips's subpoenas by May 23, 2014.

Dated: May 2, 2014

Respectfully submitted,

/s/ Denise W. DeFranco

Denise W. DeFranco

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Two Seaport Lane

Boston, MA 02210-2001

E-mail address: denise.defranco@finnegan.com

Telephone: (617) 646-1600

Facsimile: (617) 646-1666

Robert K. Shaffer

J. Michael Jakes

David K. Mroz

Susan Tull

Scott A. Allen

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

901 New York Avenue, NW

Washington, DC 20001-4413

E-mail address: robert.shaffer@finnegan.com

E-mail address: mike.jakes@finnegan.com

E-mail address: dave.mroz@finnegan.com

E-mail address: susan.tull@finnegan.com

E-mail address: scott.allen@finnegan.com

Telephone: (202) 408-4000

Facsimile: (202) 408-4400

Attorneys for

KONINKLIJKE PHILIPS N.V. and

PHILIPS ELECTRONICS NORTH AMERICA
CORPORATION

CERTIFICATE OF SERVICE

A copy of the foregoing was electronically filed with the Court this 2nd day of May, 2014. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Denise W. DeFranco

Denise W. DeFranco

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Two Seaport Lane

Boston, MA 02210-2001

E-mail address: denise.defranco@finnegan.com

Telephone: (617) 646-1600

Facsimile: (617) 646-1666

Attorney for

KONINKLIJKE PHILIPS N.V. and
PHILIPS ELECTRONICS NORTH AMERICA
CORPORATION